

# MICHAEL FEENEY - WRITER - TELEVISION AND FILM

March 29, 1999

Dockets Management  
Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

4 6 1 8 '99 APR -7 10:38

Re: Docket #98N-1038, "Irradiation in the production, processing and handling of food".

Dear FDA,

Yes, indeed, irradiated food must be labeled as such. As with genetically altered food. It is imperative that you respect the rights of the consumer and inform him or her in up-front, clearly visible, legible verbiage.

Thank you.

Now, regarding food irradiation, here are some answers to your questions:  
FDA encourages you to address these questions in your comments:

- (1) Does the current radiation disclosure statement convey meaningful information to consumers in a truthful and non-misleading manner?

**NO. IT MUST BE MADE MORE CLEAR AND VISIBLE.**

- (2) How do consumers perceive the current radiation disclosure statement -- as informational, as a warning, or as something else?  
**"WARNING" SINCE IT IS AN ARTIFICIAL, HIGH ENERGY, AND POTENTIALLY MUTAGENIC APPLICATION.**

- (3) Does the wording of the current radiation disclosure statement cause "inappropriate anxiety" among consumers? What are examples of "inappropriate anxiety"?

**NO. EXAMPLE OF "inappropriate anxiety" IS LABELING "ORGANIC" FOODS TO FOOD THAT IS NOT ORGANIC, BUT GENETICALLY ALTERED AND (FOR VEGETABLES) GROWN IN RECONSTITUTED SEWER SLUDGE.**

- (4) What specific alternate wording for a radiation disclosure statement would convey meaningful information to consumers, in a truthful and nonmisleading manner, and in a more accurate or less threatening way than the current wording?

**WARNING: IRRADIATED FOOD**

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**(5) Would consumers be misled by the absence of a radiation disclosure statement in the labeling of irradiated foods? Are consumers misled by the presence of such a statement? YES TO FIRST PART OF QUESTION; YES TO THE LATTER QUESTION---IF LABELING IS NOT VISIBLE ENOUGH, AND NOT SPECIFIC ENOUGH (i.e. hidden, or written in a chameleon fashion so as to dupe consumers, as food processors are want to do).**

**(6) With respect to foods containing irradiated ingredients, are consumers misled by the absence of a radiation disclosure statement? Would consumers be misled by the presence of such a statement?**

**This is a redundant question. Excise.**

**(7) What is the level of direct consumer experience with irradiated foods that are labeled as such?**

**THIS QUESTION IS AN EXAMPLE OF CONFUSING LABELING - WHAT DOES THIS QUESTION MEAN? GET BETTER COMMUNICATORS ON YOUR STAFF.**

**(8) What is the effect of the current required labeling on the use of irradiation? Does the current required labeling discourage the use of irradiation? INADEQUATE INFORMATION TO ANSWER. IMMATERIAL QUESTION.**

**(9) What do consumers understand to be the effect of irradiation on food? For example, what do consumers understand about the effect of irradiation on the numbers of harmful microorganisms in or on food? FIND OUT FOR YOURSELF AND PUBLISH THE INFORMATION. YOU'RE THE ONES WITH THE LABS.**

**(10) Do consumers readily recognize the radura logo?**  
**NO**

**(11) Do consumers understand the logo to mean that a food has been irradiated?**  
**NO**

**(12) Do consumers perceive the radura logo as informational, as a warning, or as something else?**  
**NO**

**(13) Should any requirement for a radiation disclosure statement expire at a specified date in the future?**  
**NO. STUPID QUESTION.**

**(14) If so, on what criteria should the expiration be based?**  
**STUPID QUESTION.**

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**(15) If the expiration of labeling requirements for irradiated foods is to be based on consumer familiarity with the radura logo and understanding of its meaning, what evidence of familiarity and understanding would be sufficient to allow these requirements to expire?**

**FIND OUT FOR YOUR SELF.**

**JUST PUT "WARNING: IRRADIATED FOOD" ON THE LABEL.**

**YOU WON'T HAVE TO WORRY ABOUT MUTAGENIC WORDS SUCH AS "RADURA".**

**WHEN PEOPLE SEE "WARNING: IRRADIATED FOOD" ON THE LABEL, THEY WILL RUN THE OTHER WAY, AS THEY SHOULD.**

**TOO MANY QUESTIONS THAT ARE REDUNDANT, AND NOT SPECIFIC ENOUGH TO GAIN ANYTHING FROM THE EFFORT.**

**THIS IS TYPICAL OF AN INEFFECTIVE ORGANIZATION, or one that might be compromised by big ag business.**

**I hope this isn't the case. Don't let dollars take the place of consumer trust and safety.**

**Your science may not be our science. What you think is safe shouldn't have to be shouldered by consumers.**

**Mike Feeney  
2008 Louella Ave  
Venice, CA 90291**

A handwritten signature in black ink, appearing to read 'Mike Feeney', with a long horizontal flourish extending to the right.

MF  
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